

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

VENICE DEGREGORIO and
NICHOLAS DEGREGORIO ,

 Plaintiffs,

v.

MARRIOTT INTERNATIONAL, INC.,

 and

JW MARRIOTT LOS CABOS BEACH
RESORT & SPA,

 Defendants.

CIVIL ACTION NO. 2:17-cv-03867-NIQA

**DEFENDANTS’ MOTION FOR LEAVE TO FILE A REPLY BRIEF IN SUPPORT OF
THEIR MOTION TO DISMISS PLAINTIFFS’ COMPLAINT FOR LACK OF
PERSONAL JURISDICTION AND *FORUM NON CONVENIENS***

Defendants Marriott International, Inc. (“MII”), Operadora Punta Peninsula, S.A. de C.V. (“OPP”), and Operadora Mision San Jose, S.A. de C.V. (“OMSJ”), incorrectly named as “JW Marriott Los Cabos Beach Resort & Spa,” hereby move this Court for an order granting them leave to file a reply brief in support of their motion to dismiss Plaintiffs Venice DeGregorio and Nicholas DeGregorio’s Complaint for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2) and *forum non conveniens*.

As set forth in the accompanying Memorandum of Law, a reply is both necessary and appropriate to correct certain material misstatements of fact raised for the first time in Plaintiffs’

opposition to Defendants' motion to dismiss. Defendants have attached their proposed reply to their Memorandum of Law in support of this motion.

WHEREFORE, Defendants Marriott International, Inc., Operadora Punta Peninsula, S.A. de C.V., and Operadora Mision San Jose, S.A. de C.V. respectfully request that the Court enter the attached proposed order, granting Defendants' motion for leave to file a reply brief and deeming Defendants' reply brief filed as of the date the Court enters the order.

Respectfully submitted,

GORDON & REES LLP

By: Ilan Rosenberg
Ilan Rosenberg (I.D. No. 89668)
C. Tyler Havey (I.D. No. 80877)
Jason E. Landro (I.D. No. 319376)
One Commerce Square
2005 Market Street, 29th Floor
Philadelphia, PA 19103
(215) 717-4026

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